

Fine Tires for Collector Vehicles

1317 Chestnut Street
Chattanooga, TN 37402

Toll Free 1-800-251-6336
Local & Int'l 423-265-6368
Fax 423-756-5607
www.coker.com

January 31, 2002

Docket Management Room PL-401
400 Seventh Street, SW
Washington, D.C. 20590

To Whom It May Concern:

49 CFR Parts 567, 571, 574, and 575
[Docket No. NHTSA -01-11157]

Tire Safety Information, Proposed Rule

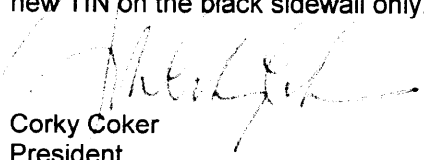
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We applaud the agencies intention to more clearly mark tires by standardizing the font and size of TIN marking as well as the reorder of the characters and letters to more clearly identify where and when a tires was manufactured. We are writing however to suggest that the proposed rule requiring the TIN be placed on **both** sidewalls would significantly alter the appearance of certain types of tires. The proposed rule is **571.139, S5.5 Tire Markings**. We refer specifically to the classic and antique variety of wide whitewall bias and radial tires. The other information required on both sides (i.e. size, max inflation and load range) is now placed in the upper portion on the white side where the tire is black. TIN marking in this location would be objectionable from an appearance standpoint.

The proposed rule stipulates the TIN placement be between the max section of the tire and the rim flange. In a wide whitewall tire this area is made of white sidewall rubber. The process of producing this type tire includes a grind of the white material to remove from 0.0625" to 0.125" of the surface to achieve the critical appearance of color and sheen. Any embossing like the TIN on the white surface would be removed in this grind.

If it were possible to alter the process allowing the TIN to remain visible, we believe it would detract significantly from the tires appearance. The white sidewall appearance on these tires is very critical.

We therefore request that the proposed rule be modified to exclude TIN marking on both sides of tires classified as wide whitewall tires for classic and antique cars. These tires would have the new TIN on the black sidewall only.


Corky Coker
President
Coker Tire

Cc: Specialty Tires of America, Denman Tire Corp.

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